

40 Broad Street, 7th Floor New York, New York 10004 Telephone: 212.943.9080 **Leonor H. Coyle Partner** lcoyle@vandallp.com

June 20, 2022

VIA U.S.P.S.

Judge Cheryl L. Pollak, U.S.M.J United States District Court Eastern District of New York 225 Cadman Plaza East, Room 1230 Brooklyn, NY 11201

Re: Esgar Romero et. al. v. Sid Boys Corp. et. al.

Case No.: 18-CV-6583 (ARR)(CLP)

Dear Judge Pollak,

This firm is counsel to the Plaintiffs in the above-referenced wage and hour action. I write jointly with Defendants pursuant to Your Honor's April 19, 2022 Order to advise the Court of the status of discovery in this case.

The parties have engaged in several calls during which we have discussed scheduling of depositions¹, as well as potential settlement, the latter with no substantial results. As far as deposition scheduling, individual Defendant Irene Siderakis is scheduled to appear for her deposition on Wednesday June 29, 2022. Defendants have advised they intend to take the deposition of five Plaintiffs, however, we have not yet finalized dates for such depositions. Additionally, Plaintiffs anticipate possibly taking additional non-party depositions after Ms. Siderakis deposition and will schedule such in a speedy manner.

In sum, the parties will proceed with Defendant's scheduled deposition, as well as the scheduling of firm dates for of any additional non-part depositions and Plaintiffs' depositions. Due to scheduled vacations throughout June, July and August, we jointly and respectfully request that the deadline for completion of all depositions be on or before September 30, 2022. I sincerely thank Your Honor for Your patience and attention to this matter.

Respectfully submitted, /s/ Leonor H. Coyle

Cc: John Diviney, Esq; Tito Sinha, Esq.(via email and ECF)

¹ Paper discovery has been completed in this matter.

